

U.S. Patent No. 6,311,194 to Sheth et al. (hereinafter “the Sheth et al. patent”). Applicant respectfully traverses the rejection.

Claim 1 provides for a method of creating a custom database. The method includes, *inter alia*, generating a search engine based upon a system description, wherein the search engine stores and locates data in the custom database.

FIG. 2 of the present application is a schematic of an exemplary system that employs the method of claim 1. A code generator 230 receives a system description in a mark-up language file 200. Based on the system description, code generator 230 generates a database structure 240 and a search engine program 250.

The Shah et al. article is directed to correlating information relating to web-based media (Abstract). Page 3 of the Office Action suggests that in the Shah et al. article, (a) an RDF object and (b) an MREF are descriptive of (i) a system description and (ii) database structure, respectively.

FIGS. 3 and 4 of the Shah et al. article illustrate a relationship between RDF and MREF, and on page 270, col. 2, in the paragraph starting with the phrase “MREFs are specified”, states:

RDF is mainly aimed at describing and exchanging meta-information about a resource (artifact) or a set of resources and their relationships. We consider MREFs to be resources that logically correlate other resources based on their metadata.

Thus, the relationship between the RDF and the MREF appears to be one of structure, i.e., logical correlation.

Applicant has not found any description in the Shah et al. article of a search engine being generated based on the RDF. Moreover, page 3 of the Office Action, fourth and fifth lines from the bottom, recognizes that the Shah et al. article does not explicitly indicate that the data

stored in the metabase is being utilized for “generating a search engine”. **Thus, the Shah et al. article neither describes nor suggests generating a search engine based on the system description, as recited in claim 1.**

The Office Action, page 4, introduces the Sheth et al. patent for its disclosure of a custom database. The Sheth et al. patent is directed toward a system and method for creating a database of metadata (Abstract), and more specifically, for semantically classifying data (col. 1, line 20). However, Applicant has not found any disclosure in the Sheth et al. patent of generating a search engine, much less generating a search engine based on a system description. **Thus, the Sheth et al. article neither describes nor suggests generating a search engine based on the system description, as recited in claim 1.**

Applicant respectfully submits that since neither of the Shah et al. article nor the Sheth et al. patent describe or suggest generating a search engine based on a system description, the cited combination of the Shah et al. article and the Sheth et al. patent does not render claim 1 unpatentable.

In addition to claim 1, the present application contains two other independent claims, namely claims 14 and 27. Both of claims 14 and 27, similarly to claim 1, include a recital of “generating a search engine based on the system description.” Thus, claims 14 and 27 are also patentable over the cited combination of references.

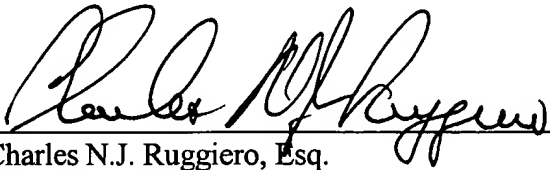
Claims 2 – 13 depend from claim 1, claims 15 – 26 depend from claim 14, and claims 28 – 39 depend from claim 27. The dependent claims are patentable over the cited combination of references for at least the same reasons as the independent claims.

Applicant respectfully requests reconsideration and withdrawal of the section 103(a) rejection of claims 1 – 39.

In view of the foregoing, Applicant respectfully submits that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicant respectfully requests favorable consideration and that this application be passed to allowance.

Respectfully submitted,

August 13, 2003
Date


Charles N.J. Ruggiero, Esq.
Reg. No. 28,468
Attorney for the Applicant
Ohlandt, Greeley, Ruggiero & Perle, L.L.P.
One Landmark Square, 10th Floor
Stamford, CT 06901-2682
Tel: 203-327-4500
Fax: 203-327-6401